

**THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

In re:

WESTMOUNT GROUP, LLC

Debtor.

§
§
§
§
§
§
§

Case No. 21-30633-hcm

Chapter 11

**MOTION FOR CONTINUANCE OF HEARINGS ON MOTION TO DISMISS
CHAPTER 11 CASE AS BAD FAITH FILING AND APPLICATION TO EMPLOY
BARRON & NEWBURGER, P.C.**

TO THE HONORABLE JUDGE OF SAID COURT:

Westmount Group, LLC (the “*Debtor*”) hereby files this Motion for Continuance of Hearings on Motion to Dismiss Chapter 11 Case as Bad Faith Filing and Application to Employ Barron & Newburger, P.C.

1. The Court has scheduled the Status Conference, Motion to Dismiss Chapter 11 Case as a Bad Faith Filing and Application to Employ Barron & Newburger, P.C. for hearing on October 20, 2021 at 1:30 p.m. MT.

2. Debtor’s principal counsel, Stephen Sather, was previously scheduled to fly to Florida to give a talk on SubChapterV to the Commercial Collection Agencies of America on October 20. He had planned to have an associate handle the status conference (and still plans to do so). However, the Motion to Dismiss and Application to Employ both involve substantive matters which should be handled by Mr. Sather personally. While his flight arrives several hours before the hearing, trying to conduct a hearing at the Ft. Lauderdale airport or in a rental car would be less than optimal.

3. Certificate of Conference: On October 4, 2021, I conferred with all of the attorneys who had entered appearances in this case. James Brewer (WestStar Title), Brad Odell (SubChapterV Trustee) and Jim Rose (U.S. Trustee) stated that they did not oppose the Motion. Don Stecker stated that he had withdrawn his client's claim in the case. Bud Kirk (Albert Flores) stated that he opposed the motion unless the hearings could be rescheduled in October. Mr. Sather is available on October 26, 27 and 29 for a continued hearing, as well as on multiple dates in November.

Dated: October 5, 2021

Respectfully submitted,

BARRON & NEWBURGER, P.C.

/s/ Stephen W. Sather
Stephen W. Sather (SBN 17657520)
7320 N. Mopac Expy., Ste 400
Austin, Texas 78731
Tel (512) 476-9103
Fax (512) 279-0310
ssather@bn-lawyers.com
ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

By my signature below, I certify that on October 5, 2021, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid to the parties-in-interest listed on the attached matrix, or electronically by the Court's ECF noticing system on those parties-in-interest registered to receive such service.

/s/ Stephen W. Sather
Stephen W. Sather

Label Matrix for local noticing
 0542-3
 Case 21-30633-hcm
 Western District of Texas
 El Paso
 Fri Sep 17 15:25:08 CDT 2021

Westmount Group, Inc.
 810 N. Kansas Street
 El Paso, TX 79902-5207

U.S. BANKRUPTCY COURT
 511 E. San Antonio Ave., Rm. 444
 EL PASO, TX 79901-2417

Albert Flores
 c/o E.P. Bud Kirk
 600 Sunland Park Dr., Ste. 4-400
 El Paso, TX 79912-5134

Albert Flores
 c/o E.P. Bud Kirk
 600 Sunland Park Drive
 Bldg 4, Suite 400
 El Paso, TX 79912-5115

City of El Paso
 c/o Don Stecker
 112 E. Pecan St. Suite 2200
 San Antonio, TX 78205-1588

Fidelity National Title Insurance Co
 c/o Shakira Kelley
 6900 Dallas Parkway, Ste 610
 Plano, TX 75024-7164

Keyvan Parsa
 7604 Plaza Redonda
 El Paso TX 79912-8402

Manny Jemente
 Acala Investments
 6044 Gateway Blvd East
 El Paso TX 79905-2023

Shabnam Izadpanahi
 36 Micmac Crescent
 North York, ON M2H2K2

Ulrick Moise
 Palacio de Paquim,
 C. Durango 2047
 32575 Cd Juarez,
 Chih. Mexico

United States Trustee - EP12
 U.S. Trustee's Office
 615 E. Houston, Suite 533
 P.O. Box 1539
 San Antonio, TX 78295-1539

Wells Fargo Business
 PO Box 6995
 Portland OR 97228-6995

WestStar Title, LLC
 c/o Kemp Smith LLP
 Attn: James W. Brewer
 221 N. Kansas, Ste. 1700
 El Paso, Texas 79901-1401

Weststar Title, LLC
 c/o James W. Brewer
 221 N. Kansas, Ste 1700
 El Paso, TX 79901-1401

Brad W. Odell
 Mullin Hoard & Brown, LLP
 1500 Broadway, Suite 700
 Lubbock, TX 79401-3169

Stephen W. Sather
 Barron & Newburger, P.C.
 7320 N MoPac Expy
 Suite 400
 Austin, TX 78731-2347

End of Label Matrix
 Mailable recipients 16
 Bypassed recipients 0
 Total 16